

MHW

IN THE
UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

FILED

6-2-2008

JUN 2 2008

MC

James G. Turner-ll,
Petitioner,

-v-

Donald A. Hulick,
Respondent.

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

No. 08 e 2264 08 C 2204

Hon. John W. Barrah,

U.S. Judge presiding.

MOTION FOR APPOINTMENT OF COUNSEL ON APPEAL

COME NOW the petitioner, James G. Turner-ll,
Pro Se, and respectfully move this Honorable Court
to appoint counsel to represent him in appeal.
IN SUPPORT, petitioner states:

1. That not only is petitioner ignorant
in the field and the practice of law, he is
also a prisoner in the custody of the Illinois
Dept. of Corrections at the Menard prison
confined to Disciplinary / Segregation Unit
as such, he has no physical access to prison
law library services, and cannot research
his meritorious claims to present in appeal

2. Next, due to tremendous photocopy/
legal postage debt of over \$10,660.00

Dollars) that petitioner owes his custodian and law library Department. Law librarian Ki Schorn refuses to photocopy documents as many times as he requests; Further, won't provide proper number of envelopes (Legal envelopes) he needs for mailing, nor, provide sufficient legal supplies that he can draft his pleadings.

3. Petitioner meets the Five Factors necessary for this Court to appoint counsel in that: i) as prisoner he can't perform investigation; ii) he can't present his claims; iii) his claims are meritorious; iv) justice best served by counsel being appointed to represent him. v) Further has being retaliated against by his continued confinement to segregation unit.

4. Accordingly, petitioner requests this Honorable Court appoint counsel to represent him on Appeal.

WAKE UP & PRAY.

Respectfully submitted,
 James G. Turner-ee
 James G. Turner-ee

STATE OF ILLINOIS)
)SS
COUNTY OF RANDOLPH)

AFFIDAVIT

I, James G. Turner, do hereby declare and affirm that the following information within this affidavit is true and correct in substance and in facts:

- 1) That I am a prisoner confined to segregation unit and have no physical access to prison law library
- 2) That due to tremendous debt I owe IDOC and law library Dept, law librarian affords me only limited copies, legal envelopes and legal supplies.
- 3) That due to my destitution I cant prepay costs to proceed on appeal and this court permitted me to proceed in forma pauperis at district court level, nor can I retain services of a private counsel.
- 4) The record in all previous and present Habeas Proceedings will be necessary on appeal.
- 5) That all statements made in preceding Motions and this Affidavit is true and correct in substance and in fact.
- 6) Further I sayeth not.

Pursuant to 28 USC 1746, 18 USC 1621 or 735 ILCS 5/1-109, I declare, under penalty of perjury, that everything contained herein is true and accurate to the best of my knowledge and belief. I do declare and affirm that the matter at hand is not taken either frivolously or maliciously and that I believe the foregoing matter is taken in good faith.

Signed on this 11th day of May, 2008

James G. Turner

Affiant